

**PERDUE FARMS INCORPORATED**

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January 20, 1998

Ms. Jennie Butler
Dockets Management Branch FDA
124201 Park Lawn Drive, Room 123
Rockville, MD 20857

RE: CVM 97132

Dear Ms. Butler:

I support the effort to increase the availability of approved animal drugs for minor species and minor uses as outlined in your proposal. There is a definite need to amend the current drug approval process to fill this gap. In the current approval process, there are major disease problems that cannot be treated because there are no approved drugs. One example of this is the lack of a treatment option for histomoniasis in pullets. Without an approved treatment option, we see this condition increasing in both incidence rate and geographic areas.

I feel that breeder pullets, in both chickens and turkeys, fall into the minor use in a major species category. In the chicken industry, pullets produced are approximately 60 million per year. This is only 3/4 of 1% of the total 8 billion meat birds produced per year.

As you are well aware, a breeder chickens are killed at approximately 65 weeks of age. Any treatment that would be done as a pullet would occur before 18 weeks of age. This results in a 47, week withdrawal period.

Currently, despite the fact that pullets belong to a major species, there is no economic incentive for drug development.

Sincerely,

A handwritten signature in cursive script, appearing to read "Donna Hill", written in dark ink.

Donna Hill, DVM, MAM, Diplomate ACPV
Director of Health Services

DH/leb

CC: Bert Mitchell

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